This application has been carefully reviewed in light of the Office Action dated September 22, 2006. Claims 24 to 50 are pending in the application, with Claims 24, 33 and 42 being in independent form. Claims 32, 41, 42 and 50 have been amended. Reconsideration and further examination are respectfully requested.

In the Office Action, Claims 42 to 49 were rejected under 35 U.S.C. § 101 for allegedly being directed to non-statutory subject matter.

Applicant has amended the term "computer readable medium" to read "computer readable storage medium". Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

Claims 24 to 31, 33 to 40 and 42 to 49 were rejected under 35 U.S.C. § 112, first paragraph, for allegedly failing to comply with the enablement requirement for use of the term "monolithic AV content". This rejection is respectfully traversed.

The Office Action contends that the specification refers to "monolithic AV content" without defining what this term encompasses, and that one of ordinary skill in the art would be unaware of what "monolithic AV content" consisted of. Applicant respectfully disagrees.

For example, the specification describes that "a Web user is, in most cases, unable to 'drill down' beyond a certain level of data, and ... further exemplifying the problem, certain types of data such as, for example, audio-visual (AV) data, typically manifest themselves as monolithic blocks of information. The internal structure of such data, whether it be a particular video segment, or fragment, in a movie, or a specific

movement in a symphony, is neither visible, nor addressable, or consequently accessible in terms of fragments". See specification, page 1, lines 20 to 21; and page 2, lines 3 to 7.

The above description of monolithic blocks of information having an internal structure which is "neither visible, nor addressable, or consequently accessible in terms of fragments" is seen to at least provide a context, which would be readily understood by one skilled in the art, for the term "monolithic AV content". As such, it is respectfully submitted that one skilled in the art would know how to make and use the invention of Claims 24 to 31, 33 to 40 and 42 to 49 without undue experimentation.

Turning to the art-based rejection, Claims 24 to 31, 33 to 40 and 42 to 49 were rejected under 35 U.S.C. § 102(e) over U.S. Patent No. 6,763,370 (Schmeidler). This rejection is respectfully traversed.

The present invention generally concerns forming an address for locating an electronically accessible Audio/Video (AV) fragment of a monolithic AV content, the monolithic AV content having a logical model defining a plurality of levels of details into the monolithic AV content for addressing a fragment of the monolithic AV content. A network address for locating the monolithic AV content is determined. A fragment identifier is generated for at least one fragment corresponding to at least one of the levels of detail of the monolithic AV content, using the logical model. The network address and the fragment identifier are combined to form a URI reference, being an address for locating the AV fragment.

Referring specifically to the claims, independent Claims 24, 33 and 42 are respectively directed to a method, an apparatus and a computer program.

Thus, among its many features, the present invention provides for (i) determining a network address for locating a monolithic AV content, which has a logical model defining a plurality of levels of details into the monolithic AV content, and (ii) generating a fragment identifier for at least one fragment corresponding to at least one of the levels of detail of the monolithic AV content, using the logical model. The applied reference of Schmeidler is not seen to disclose or suggest at least these features.

As understood by Applicant, Schmeidler discloses a system for delivery of on-demand content in which a plurality of encrypted titles are stored on a content server coupled to the network. See Schmeidler, Abstract. Upon invocation, a launcher 220 extracts a Universal Resource Name (URN) from a Launch String and requests a Conditional Access Server (CAS)210 to perform a URN to URL conversion. The URN is a unique identifier of a title. See Schmeidler, page 13, lines 49 to 53. In the URN to URL conversion, if given a URN query, a corresponding URL is returned from a database where URLs are stored. See See Schmeidler, page 18, lines 20 to 25. A launcher may also contact a CAS server to obtain a list of URLs that correspond to a requested URN. See Schmeidler, page 24, lines 16 to 17.

As such, since the URLs which are seen to correspond to titles are stored in a list, Schmeidler is seen to convert a URN to a URL based on a predefined and finite number of titles. This is different than the present invention, in which monolithic AV content has a logical model defining a plurality of levels of details into the monolithic AV content for addressing a fragment of the monolithic AV content. Furthermore, in the present invention, a fragment identifier is generated for at least one fragment corresponding to at least one level of detail of the monolithic AV content. Thus, the present invention is

seen to provide advantages over Schmeidler's arrangement, in which predefined titles limit a user's ability to select a fragment of content.

Schmeidler is therefore not seen to disclose or suggest (i) determining a network address for locating a monolithic AV content, which has a logical model defining a plurality of levels of details into the monolithic AV content, and (ii) generating a fragment identifier for at least one fragment corresponding to at least one of the levels of detail of the monolithic AV content, using the logical model.

Accordingly, based on the foregoing amendments and remarks, independent Claims 24, 33 and 42 are believed to be allowable over the applied references.
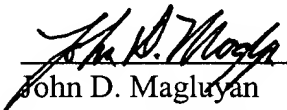
The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

With respect to non-elected Claims 32, 41 and 50, each of these claims have been amended to depend on Claim 24. Accordingly, rejoinder of Claims 32, 41 and 50 is respectfully requested upon the allowance of Claim 24, pursuant to MPEP § 821.04(a).

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicant's undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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